

Melissa A. Sandoval (NSBN 12587)
UNION PACIFIC RAILROAD COMPANY
Law Department
10031 Foothills Boulevard, Suite 200
Roseville, CA 95747
Telephone: (916) 789-6132
msandoval@up.com

John A. Hunt (NSBN 1888)
Bert Wuester, Jr. (NSBN 5556)
CLARK HILL, PLLC
3800 Howard Hughes Parkway, Suite 500
Las Vegas, NV 89169
Telephone: (702) 862-8300
jhunt@clarkhill.com
bwuester@clarkhill.com

Pat Lundvall (NSBN 3761)
McDONALD CARANO LLP
2300 West Sahara Avenue, Suite 1200
Las Vegas, NV 89102
Telephone: (702) 873-4100
lundvall@mcdonaldcarano.com

*Attorneys for Defendant
Union Pacific Railroad Company*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

GREG GIBBONS,

Plaintiff,

vs.

UNION PACIFIC RAILROAD COMPANY,

Defendant.

Case 2:15-cv-02231-GMN-CWH

**STIPULATION AND [PROPOSED]
ORDER FOR EXTENSION OF TIME
(FIRST REQUEST)**

Plaintiff Greg Gibbons (“Gibbons”) and Defendant Union Pacific Railroad Company (“Union Pacific”), stipulate to an extension of time from June 25, 2018 to June 28, 2018 for Union Pacific to file its Reply in Support of Union Pacific’s Motion for New Trial or in the Alternative for Remittitur Pursuant to FRCP 59(a) (Doc. 135) and Reply in Support of Union Pacific’s Motion to Alter or

Amend the Judgment Pursuant to FRCP 59(e) (Doc. 137). This extension is not sought for delay.
This extension is a first request.

Dated this 22nd day of June, 2018.

MCDONALD CARANO LLP

BRENT COON & ASSOCIATES

/s/ Pat Lundvall
Pat Lundvall (NSBN 3761)
McDONALD CARANO LLP
2300 West Sahara Avenue, Suite 1200
Las Vegas, Nevada 89102
Telephone: (702) 873-4100
lundvall@mcdonaldcarano.com

/s/ James A. Morris, Jr.
James A. Morris, Jr. (pro hac vice)
4111 West Alameda Avenue, Suite 611
Burbank, California 91505
Telephone: (747)-283-1144
jmorris@jamlawyers.com

Melissa A. Sandoval (NSBN 12587)
UNION PACIFIC RAILROAD COMPANY
Law Department
10031 Foothills Boulevard, Suite 200
Roseville, CA 95747
Telephone: (916) 789-6132
msandoval@up.com

Peter C. Wetherall (NSBN 4414)
WETHERALL GROUP, LTD.
9345 W. Sunset Road, Suite 100
Las Vegas, Nevada 89148
Telephone: (702) 838-8500
pwetherall@wetherallgroup.com

*Attorneys for Plaintiff
Greg Gibbons*

John A. Hunt (NSBN 1888)
Bert Wuester, Jr. (NSBN 5556)
CLARK HILL, PLLC
3800 Howard Hughes Parkway, Suite 500
Las Vegas, NV 89169
Telephone: (702) 862-8300
jhunt@clarkhill.com
bwuester@clarkhill.com

*Attorneys for Defendant
Union Pacific Railroad Company*

It is SO ORDERED this 30 day of June, 2018.


United States District Judge

CERTIFICATE OF SERVICE

I certify that I am an employee of McDonald Carano, and that on the 22nd day of June, 2018, a true and correct copy of the foregoing STIPULATION AND [PROPOSED] ORDER FOR EXTENSION OF TIME (FIRST REQUEST) was electronically filed with the Clerk of the Court by using CM/ECF service which will provide copies to all counsel of record registered to receive CM/ECF notification.

/s/ Beau Nelson

An employee of McDonald Carano LLP